

LAW OFFICES
JOSEPH J. RHOADES
SUITE 1200
LEGAL ARTS BUILDING
1225 KING STREET
P.O. BOX 874
WILMINGTON, DELAWARE 19899-0874

JOSEPH J. RHOADES
A. DALE BOWERS

(302) 427-9500
FAX (302) 427-9509

Sender's Direct E-mail:
joe.rhoades@rhoadeslegal.com

September 23, 2005

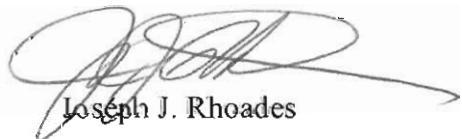
The Honorable Joseph J. Farnan, Jr.
United States District Ct.
District of Delaware
844 King St., Lock Box 27
Wilmington, DE 19801

RE: Crowell v. Pace International Union Local 2-0770
C.A. No. 04-259

Dear Judge Farnan:

Enclosed please find a letter, submitted on behalf of Pace International, in the above-captioned matter.

Respectfully yours,



Joseph J. Rhoades

JJR/cm

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DISTRICT OF DELAWARE
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US DISTRICT COURT
DISTRICT OF DELAWARE

LAW OFFICES

MARKOWITZ & RICHMAN

1100 NORTH AMERICAN BUILDING

121 SOUTH BROAD STREET

PHILADELPHIA, PENNSYLVANIA 19107

(215) 875-3100

TELECOPIER (215) 790-0668

DIRECT DIAL

ALLENTOWN OFFICE
SUITE 200 COMMONWEALTH BLDG.
512 HAMILTON STREET
ALLENTOWN, PA 18101-1505
(610) 820-9531

NEW JERSEY OFFICE
24 WILKINS AVENUE
HADDONFIELD, NJ 08033
(856) 816-2930

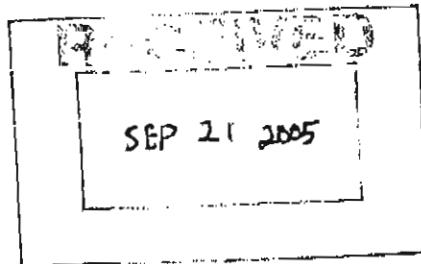
NEW YORK OFFICE
880 THIRD AVENUE
NINTH FLOOR
NEW YORK, NY 10022
(212) 752-8781

HARRISBURG OFFICE
27 SOUTH ARLENE STREET
P.O. BOX 6865
HARRISBURG, PA 17112-6865
(717) 541-9475

RICHARD H. MARKOWITZ *
STEPHEN C. RICHMAN *
PAULA R. MARKOWITZ
QUINTES D. TAGLIOLI
JONATHAN WALTERS ++
ANTHONY C. BUSILLO II
THOMAS H. KOHN ***
RUTH SKOGLUND
R. MATTHEW PETTIGREW, JR. **
PETER H. DEMKOVITZ +
CHARLES F. SZYMAŃSKI +
NANCY A. WALKER

* ALSO ADMITTED IN NEW YORK
AND DISTRICT OF COLUMBIA
+ ALSO ADMITTED IN NEW JERSEY
++ ALSO ADMITTED IN DISTRICT OF COLUMBIA
** ALSO ADMITTED IN NEW JERSEY AND NEW YORK
*** ALSO ADMITTED IN VIRGINIA
AND DISTRICT OF COLUMBIA

The Honorable Joseph J. Farnan, Jr.
United States District Court
District of Delaware
844 King Street, Lock Box 27
Wilmington, DE 19801



File No. 3-770-11

Re: Crowell v. Pace International Union Local 2-0770
C.A. No. 04-259

Dear Judge Farnan:

In response to Barry Willoughby's letter to you of September 16, 2005, the Union disagrees with the Employer's contention that the Union's Motion for Relief from the Court's judgment in this matter is moot. Although the Union did file a protective grievance, which is now scheduled for arbitration on November 22, 2005, concerning whether Robert Blisard is entitled to remedial relief, that action was taken solely to provide an alternative mechanism to obtain relief in the event that the Court should decline to grant the Union's pending motion.

Contrary to the Employer's contention that the motion is moot, should the Court grant the requested relief, it is the arbitration that would become moot. The Union firmly believes that its motion for relief from the Court is justified; however, should the Court determine that the arbitration takes precedence, Local 770 requests that the Court retain jurisdiction pending the outcome of that arbitration.

Respectfully,

Thomas Kohn
THOMAS H. KOHN

THK/sdk

cc: Barry Willoughby, Esquire
Carl Jones